

AO91 (Rev. 12/03) Criminal Complaint

**FELONY****AUSA****United States Courts****UNITED STATES DISTRICT COURT**Southern District of Texas  
FILED*May 3, 2025*

Southern District Of Texas Brownsville Division

Nathan Ochsner, Clerk of Court

**UNITED STATES OF AMERICA****CRIMINAL COMPLAINT**

vs.

Case Number: 1:25-MJ-356

Osvaldo Ulises TREJO-Flores  
 A220 450 074 Mexico  
 AKA Osvaldo TREJO-Flores, Osbaldo TREJO-Flores, Trejo-flores OSVALDO

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about May 02, 2025 in Cameron County, in the Southern District Of Texas defendant(s) an alien who had previously been denied admission, excluded, deported, or removed, knowingly and unlawfully was present in the United States having been found in Cameron County, Texas, the said defendant having not obtained the consent of the Attorney General or the Secretary of the Department of Homeland Security to reapply for admission into the United States,

in violation of Title 8 United States Code, Section(s) 1326(a)(1)

I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts:

The defendant was encountered by Border Patrol agents conducting Linewatch operations near Brownsville, Texas on May 02, 2025. The defendant is a citizen and national of Mexico who was previously deported, excluded or removed from the United States on March 27, 2025. Record checks revealed that the defendant has not applied for permission from the proper Authorities to re-enter the United States.

Defendant had \$50 Mexican pesos at time of apprehension.

Continued on the attached sheet and made a part of this complaint:

Yes  No

Signature of Complainant

Guzman, Carlos Border Patrol Agent

Printed Name of Complainant

Brownsville, Texas

City/State

*Karen Betancourt*

Signature of Judge

Karen Betancourt  
Name of Judge

U.S. Magistrate Judge  
Title of Judge